



Driving progress
through partnership

John B. Berringer

Direct Phone: +1 212 205 6010

Email: jberringer@reedsmith.com

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022-7650
+1 212 521 5400
Fax +1 212 521 5450
reedsmith.com

September 27, 2021

VIA ECF AND FACSIMILE

Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

So ordered,
/s/ Alvin K. Hellerstein
Alvin K. Hellerstein
9/28/21

RE: The Roman Catholic Diocese of Rockville Centre, New York v. Arrowood Indemnity Company, *et al.* (*In re The Roman Catholic Diocese of Rockville Centre, New York*); Case 1:21-cv-7706-AKH)

Dear Judge Hellerstein:

We represent debtor/plaintiff The Roman Catholic Diocese of Rockville Centre, New York (“Plaintiff”) in the above-referenced matter. On October 1, 2020, Plaintiff commenced this action by filing its complaint in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) docketed as Adv. Pro. No. 20-01227-SCC (the “Adversary Proceeding”).

On September 10, 2021, Fireman’s Fund Insurance Company, Interstate Fire & Casualty Company and National Surety Corporation (collectively, the “Allianz Defendants”) filed in the Bankruptcy Court their *Motion to Withdraw the Reference to the Bankruptcy Court Pursuant to 28 U.S.C. § 157(d), Rule 5011(a) of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 5011-1* (the “Allianz Motion”). On September 15, 2021, the Allianz Motion was transmitted to the District Court by the Clerk of the Bankruptcy Court and has been assigned to Your Honor as Case 1:21-cv-07706-AKH. Pursuant to the Local Rules of this Court, Plaintiff’s¹ response to the Allianz Motion is presently due on or before September 29, 2021.

Pursuant to Rule 1(D) of Your Honor’s Individual Rules, Plaintiff writes, with the consent of counsel for the Allianz Defendants, to request that the deadline for Plaintiff to file and serve its response to the Allianz Motion be extended **to and including October 13, 2021** and that the Allianz Defendants shall have **to and including October 27, 2021** to file and serve a reply, if any, in support of the Allianz Motion.

¹ On December 10, 2020, the Bankruptcy Court entered an Order granting the motion of the Official Committee of Unsecured Creditors (the “Committee”) to intervene in the Adversary Proceeding. Reference herein to Plaintiff’s deadlines are intended to also refer to the Committee’s deadline to file a response to the Allianz Motion, if any.

Honorable Alvin K. Hellerstein
September 27, 2021
Page 2

ReedSmith

This is the first request for the relief requested herein. There are at present no other dates or deadlines in this action that will require modification should the requested relief be granted. Accordingly, it is respectfully requested that the Court grant the extensions requested herein.

Respectfully submitted,

/s/ John Berringer

John Berringer

cc: (VIA e-mail)

Peter P. McNamara, Esq. (peter.mcnamara@rivkin.com)
Siobhain Minarovich, Esq. (siobhain.minarovich@rivkin.com)
Charles E. Jones, Esq. (Charles.Jones@lawmoss.com)
*Counsel for Fireman's Fund Insurance Company,
Interstate Fire & Casualty Company and National Surety Corporation*

Timothy W. Burns, Esq. (tburns@bbblawllp.com)
Jesse J. Bair, Esq. (jbair@bbblawllp.com)
*Special Insurance Counsel for the Official
Committee of Unsecured Creditors of The Roman Catholic
Diocese of Rockville Centre, New York*